

REMARKS

Claims 1-31 and 33-52 are pending. Claim 32 has previously been cancelled without prejudice or disclaimer to the subject matter set forth therein. In this response, claims 1, 3, 5, 11, 13, 22, 24, 30, 34, 40, 41, and 47-49 are amended, and claims 51-52 are added. No new matter has been added. Support for the claim amendments may be found at page 9, lines 14-22 of the Specification, for example.

Reconsideration of the outstanding rejections in the present application are requested based on the following remarks.¹

A. THE OBJECTION TO CLAIMS 47-49

On page 2 of the Office Action, claims 47-49 stand objected. The Office Action reflects that the claims are dependent on claim I (the letter).

Applicant has amended the claims to correct the minor informalities.

In view of the foregoing, Applicant respectfully requests that the objection to claims 47-49 be withdrawn.

B. REJECTION UNDER 35 U.S.C. § 102(e)

Claims 1, 7, 11-20, 22-31, and 33-50 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent 6,850,531 to Rao *et al.* ("Rao"). *Office Action*, p. 3. This rejection is hereby respectfully traversed.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima facie case of anticipation. As stated in MPEP § 2131, "[a] claim is anticipated only if each and

¹ As Applicant's remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicant's silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (*e.g.*, assertions regarding dependent claims, whether a reference constitutes prior art, whether references are legally combinable for obviousness purposes) is not a concession by Applicant that such assertions are accurate or such requirements have been met, and Applicant reserves the right to analyze and dispute such in the future.

every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” Verdegaal Bros. v. Union Oil Co. of California, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Regarding claim 1, the Office Action asserts that Rao discloses the present patent application. Applicant respectfully disagrees. However, in order to forward the present application, Applicant has amended claim 1 to more specifically define the claimed invention. In particular, Applicant respectfully submits that Rao fails to disclose, or even suggest, a multiple port unit adapted for coupling one or more computers to multiple peripheral devices over a network, said multiple port unit comprising: plural network ports, each of said network ports being configured to couple the multiple port unit to a computer via one or more hubs over a respective network link,” as recited in claim 1 of the present application. (Emphasis added). In contrast, Rao discloses that:

Each FM 10 may have associated application-specific daughter cards, referred to as personality modules (PMs) 12, for additional physical line interfaces or support hardware. In the preferred embodiment, there are one or two PMs associated with each FM. Exemplary PMs 12 include Ethernet switch PMs 12a, primary rate interface PMs 12b, digital modem server PMs 12c, and serial data interface PMs 12d. Together, the FMs 10 and PMs 12 allow an ISP to provide a wide range of services and support a wide range of applications, all within a single platform.

The Ethernet switch PM 12a enables a LAN connection to a public network, such as the Internet. This module is typically used to connect server farms, intranets, and Web servers to the Internet. According to one embodiment of the invention, the Ethernet switch PM 12a provides twelve 10 Mb Ethernet ports and two 10/100 Mb auto-sensing Ethernet/fast Ethernet ports.

Rao, C. 5, ll. 8-24. Rao fails to disclose that the plural network ports are configured to couple the multiple port unit to a computer via one or more hubs over a respective network link, as recited in claim 1 of the present application. Hence, Rao does not disclose each and every element recited in claim 1 of the present application.

Regarding independent claims 11, 22, 30, and 40, since these claims contain similar limitations as argued above with respect to independent claim 1, the same arguments apply to these independent claims.

Regarding claims 7, 12-20, 23-29, 31, and 33-39, and 41-50, these claims are dependent upon independent claims 1, 11, 22, 30, or 40. Thus, since independent claims 1, 11, 22, 30, and 40 should be allowable at least by virtue of their dependency on independent 1, 11, 22, 30, or 40. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited reference taken either alone or in combination. For example, claim 3 recites that “control unit interrogates the computers over each of the network links in an alternating periodic manner, wherein the control unit compares two values received at different time periods from the computers,” as recited in claim 3.

For at least these reasons, independent claims 1, 11, 22, 30, and 40, as well as dependent claims 2-10, 12-21, 23-29, 31, 33-39, and 41-50, are patentable over Rao. Accordingly, Applicant respectfully requests that the rejection of claims 1-7, 11-20, 22-31, and 33-50 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

C. REJECTION OF CLAIM 21 UNDER 35 U.S.C. § 103(a)

Claim 21 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Rao in view of U.S. Patent 6,222,714 to Hoffman *et al.* (“Hoffman”). *Office Action*, p. 11. This rejection is traversed. Applicant respectfully submits that since claim 21 is dependent on allowable independent claim 11 and since Hoffman does not cure the deficiencies of Rao with respect to claim 11, dependent claim 21 is allowable as well. Therefore, the undersigned representative will not address the arguments with respect to claim 21 and reserves the right to address these arguments at a later time.

In view of the foregoing, Applicant respectfully requests that the aforementioned obviousness rejection of claims 21 be withdrawn.

D. REJECTION OF CLAIMS 2-6 & 8-10 UNDER 35 U.S.C. § 103(a)

Claims 2-6 and 8-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rao in view of U.S. Patent 6,591,314 to Colbath. *Office Action*, p. 11. This rejection is traversed. Applicant respectfully submits that since claims 2-6 and 8-10 are dependent on allowable independent claim 1 and since Colbath does not cure the deficiencies of Rao with respect to claim 1, dependent claims 2-6 and 8-10 are allowable as well. Therefore, the undersigned representative will not address the arguments with respect to claims 2-6 and 8-10 and reserves the right to address these arguments at a later time.

In view of the foregoing, Applicant respectfully submits that the aforementioned obviousness rejection of claims 2-6 and 8-10 be withdrawn.

E. NEWLY ADDED CLAIMS 51 and 52

Regarding newly added dependent claims 51-52, Applicant respectfully submits that support for the newly added claims may be found at least in the Specification on page 9, lines 14-22, for example. Claims 51-52 should be allowable at least by virtue of their dependency on independent claims 1, 11, 22, 30, and 40. Moreover, these claims recite additional features which are not disclosed, or suggested, by the cited references taken either alone or in combination.

For example, Rao fails to disclose, or even suggest, that “the value received from the computer is a number of seconds from a reference point of a day,” as presently claimed. Accordingly, Applicant respectfully submits that the newly added claims 51-52 are allowable over Rao and other applied art.

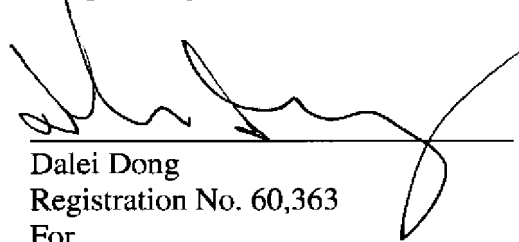
F. CONCLUSION

The foregoing is submitted as a full and complete Response to the Non-final Office Action mailed November 7, 2008, and early and favorable consideration of the claims is requested. If the Examiner believes any informalities remain in the application which may be corrected by Examiner's Amendment, or if there are any other issues which may be resolved by telephone interview, a telephone call to the undersigned attorney at (703)714-7448 is respectfully solicited.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 50-0206, and please credit any excess fees to such deposit account.

Date: March 9, 2009

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dalei Dong', is written over a horizontal line. The signature is fluid and cursive.

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